

AO 91 (Rev. 08/09) Criminal Complaint

FILED**UNITED STATES DISTRICT COURT**

for the

Western District of Texas

AUG - 2 2012

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY DEPUTY CLERK

United States of America)

v.)

BRENDA MANCHA)

Case No. 5:12-MJ-765)

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 1/1/2011-12/30/11 in the county of Bexas in the
Western District of Texas, the defendant(s) violated:*Code Section*
21 USC 846*Offense Description*
Conspiracy to Distribute Heroin and Cocaine

This criminal complaint is based on these facts:

SEE ATTACHMENT

☒ Continued on the attached sheet.*Complainant's signature*

Rick Carroll, Special Agent DEA

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/01/2012*Judge's signature*City and state: San Antonio, Texas

HENRY BEMPORAD, US MAGISTRATE JUDGE

Printed name and title

20 years confinement, \$1,000,000 Fine or both; 3 years supervised release; \$100 mandatory special assessment

ATTACHMENT - COMPLAINT AFFIDAVIT

I, Rick Carroll, being duly sworn, do hereby depose and state:

My name is Rick Carroll and I am a Special Agent with the Drug Enforcement Administration. I have conducted numerous investigations of drug-trafficking groups and individuals in the 17 years that I have been an agent. I am familiar with and have used numerous investigative techniques such as judicially-authorized interception of telephone or electronic communications, interviewing of witnesses and use of informants, surveillance, and gathering and evaluating physical evidence.

In 2010 San Antonio DEA agents, including myself, began a broad and in-depth investigation of a criminal enterprise in San Antonio known as the Texas Syndicate. I, fellow agents, and state investigators have devoted hundreds of hours in this investigation. We have tapped multiple telephone lines, interviewed numerous witnesses, spoken to numerous cooperating members of the Texas Syndicate, obtained numerous surreptitious audio and video recordings of Texas Syndicate members in and around San Antonio discussing their various crimes.

As a result of this investigation agents were able to identify extensive drug-trafficking activities of nearly all of the Texas Syndicate members in the San Antonio area. I was able to identify the principal drug supplier for the Texas Syndicate in San Antonio: Rolando Muniz. We intercepted thousands of telephone calls made by Muniz on his cell telephones. Interception began in February 2011 and continued for several months. A significant number of these calls were drug-related or involved discussions of crimes committed by the San Antonio Texas Syndicate membership. For example, Muniz was intercepted arranging and coordinating numerous multi-kilograms shipments of cocaine and heroin to San Antonio; he was intercepted distributing to various buyers of the cocaine and heroin that had arrived in San Antonio; he was intercepted discussing supplying fellow Texas Syndicate members with heroin and cocaine; and he was intercepted arranging collection of drug proceeds.


In the course of this investigation, (which continues today) investigators learned from multiple persons that BRENDA MANCHA is an associate of the Texas Syndicate and has close ties to many of its members. Muniz was intercepted talking to Brenda Mancha, who is the mother of Texas Syndicate member Manual Mancha. On March 17, 2011, in an intercepted (and therefore, recorded) telephone call between Muniz and BRENDA MANCHA, the two discussed heroin. Muniz told BRENDA MANCHA that he had heroin available for sale. Muniz also made mention of a previous heroin transaction between him and BRENDA MANCHA. BRENDA MANCHA asked about the quality and price, and the two reached an agreement for Muniz to sell the heroin to BRENDA MANCHA.

On July 24, 2011 multiple agents and I watched the San Antonio Texas Syndicate hold a meeting on the shore of Lake Medina, thirty miles outside of San Antonio. The meeting was recorded surreptitiously. At the meeting, BRENDA MANCHA was discussed extensively by the Texas Syndicate members. There were complaints by members that she knew too much about Texas Syndicate criminal activity and how she conducted her narcotics-trafficking. Members complained

that after BRENDA MANCHA supplied them with narcotics, she demanded payment from them in an unreasonable manner. It was clear from the discussions that BRENDA MANCHA does regular narcotics business with the Texas Syndicate and has done so for an extended period of time.

I have interviewed several members of the Texas Syndicate who know BRENDA MANCHA. All of them state she is a Texas Syndicate associate; her son is a Texas Syndicate member, and she currently lives with a Texas Syndicate member. They each state BRENDA MANCHA distributes heroin and cocaine regularly and supplies Texas Syndicate members with cocaine and heroin and has done so from at least 2010 to 2012. They state they have done regular cocaine or heroin deals with her during the course of our investigation.

There is probable cause to believe BRENDA MANCHA conspired with others throughout 2011 to distribute and to possess with intent to distribute heroin and cocaine.


Rick Carroll,
Special Agent, DEA

Sworn to and subscribed before me this 2nd day of August, 2012


HENRY BEMPORAD,
United States Magistrate Judge